

ISO - International Organisation for Standardisation
IEC - International Electrotechnical Commission

JTC 1 - “Information Technology”
SC 27 - “Security Techniques”
WG 3 - “Security Evaluation Criteria”

TITLE: Disposition of Comments on WD 15292, Information technology – Security techniques – Protection profile registration procedures

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PROJECT: JTC 1.27.20

STATUS: For distribution within JTC 1/SC 27

Disposition of Comments for Project JTC1.27.20

Comments were received on the Third WD for Protection Profile Registration Procedures, SC 27 N2168, from several National Bodies (see SC 27 N2246rev2). These are answered below.

The Project Editor notes the offer of the French NB to act as a JTC 1 Registration Authority (RA) against these procedures (SC 27 N2262), and thanks, with relief, AFNOR for being the first organisation to make such an offer.

Given the likelihood that SC 27 will therefore nominate such a JTC 1 RA, the Project Editor will amend the procedures to reflect the appointment of a single international RA.

French NB (Attachment 1 to N2246rev2)

1. A definition of Registration Authority (RA) will be added.
2. The AFNOR interpretation of the mission of the RA is correct and it will be made clear and consistent throughout the WD that the RA makes only editorial checks on PPs and packages submitted for registration.
3. In the context of these procedures, it is not possible to define a non-technical meaning to a “clear distinction” between proposed entries. The requirement upon the RA to make such a distinction when considering new entries will therefore be withdrawn.
4. Working language. The AFNOR proposal that the applicant must submit a description of the entry in the English language is accepted. This will be added as a requirement to clause 13. It will also be made explicit that the technical specification may be submitted in any natural language.
5. Information over the Web. It is agreed that the content of the technical specification must be defined by reference to ISO/IEC 15408. Since the RA has no technical expertise, it cannot impose or check the “minimal technical content” of this specification. The WD will confirm that this technical specification will be available free of charge over the WWW.
6. Dispute on replacement. The WD will be amended to make possible the assignment of ownership of entries. However, the written permission of the current owner will be needed to take over ownership.
7. Qualifying Certifying Authority. This standard cannot define “qualifying” as applied to certifying authorities. However, the contents of register entries will be modified to include the name of any evaluating entity and the name of any certifying authority appointed IAW with ISO Guide 25. The RA will advise these organisations that they have been referenced in a submission for registration but will not be responsible to check the accuracy of the information supplied.

8. Detailed Comments. 1-Accepted. 2.-No, (and overtaken by change to single JTC 1 RA). 3.-Accepted. 4.-3 months to remain so as to provide contingency time for difficult cases. 5.-To be included in the 3 months processing time.
9. Annex A. Comment not accepted – this information should not appear under scope according to Directives Part 3.
10. Incomplete PPs. Comment not accepted. This facility will be retained as it is believed by many experts to be of value.

German NB Comments (Attachment 2 to N2246rev2)

1. A clarification to permit the use of any natural language in the technical specification will be added to the WD to permit non-English entries.
2. The permission of the current sponsor of a register entry will still be required to continue registration. This will be clarified in the WD.
3. The RA will be required to advise any evaluating or certifying entity that they have been referenced. The onus will be on the evaluator and certifier to reply if there is a problem with the reference, either before or after registration. If an evaluation report or certificate is withdrawn, the status of the register entry will be downgraded. A status change field will therefore be added to register entries, to record the date when a register status changes.

US NB Comments (Attachment 3 to N2246rev2)

- G1. The US is thanked for its thanks.
- G2. Subsetting. The WD did not envisage subsetting. It will be made clear in the WD that subsetting within the technical specification of an entry is not permitted.
- T1. Comment accepted. WD will be changed accordingly.
- T2. Comments accepted. Both evaluated and certified statuses will be recognised within the WD.
- T3. Comment superseded by change to single JTC 1 RA.
- T4. Comment accepted as part of T2.
- T5. Comment accepted. Requirement will be removed as it required a RA technical judgement.

- T6. a. Comment accepted as part of T2. b. Not accepted. It would be overly prescriptive to explicitly mention such special arrangements.
- T7. Comment accepted as part of T2.
- T8. Comment accepted. Additional status will be added.
- T9. a. Comment accepted as part of T8. b. Comment accepted. Delay period will be 18 months.
- T10. a. Comment rejected – use of “is” is correct UK English. b. Comment accepted as part of T8. c. Clock will not be reset. This will be clarified in the WD.
- T11. Comment accepted as part of T8.

ECMA Comments (Attachment 4 to N2246rev2)

- G1. Noted and accepted.
- G2. Noted and accepted.
- G3. Comment noted . The WD will be clarified to state that subsetting is not allowed.
- G4. Comment accepted. However delay period will be set to 18 months for consistency with changes requested by US NB.
- T1. The technical specification must be in one natural language. Translations may also be supplied, but the definitive and official version must be clearly identified by the sponsor of the entry.
- T2. English is mandated for the register entry details only. These are factual, and translation/understanding should not be a problem.
- T3. Comment no longer applicable as requirement is to be removed for other reasons.
- T4. Register entries will be retained forever. This will be clarified in the WD.
- T5. This is an error and will be corrected in the next version of the WD.
- T6. This comment is accepted and will be implemented in the next version of the WD.
- T7. This cannot happen, as subsetting or specification by incremental changes is not permitted.

- T8. Comment no longer applicable as there will be a single JTC 1 RA in the next version of the WD.

Japanese NB Comments (Attachment 5 to N2246rev2)

1. Comment not accepted. In certain legal systems, only “legal entities” can sign contracts. Hence this requirement is necessary.
2. Comment not accepted. The general view of WG 3 Experts is that a 5 year commitment by the RA is a reasonable condition. This commitment is already less than the 10 years recommended in JTC 1 procedures.
3. Comment not accepted. This requirement is already present in subclause 6.2, final point.

Canadian NB Comments (Attachment 6 to N2246rev2)

- T1. Comment not accepted in full. A second standard seems excessive; however, some of the procedures will be removed from the next WD as there will be only a single JTC 1 RA.
- T2. The implication to change the title is not accepted. A paragraph will be added to the scope clause of the next WD to cover maintenance of registers etc.
- T3. This comment is not accepted at this time; as the order follows the JTC 1 description. However, clause 6 will become an annex, to improve the logical presentation.
- T4/5. The Editor will check the specified documents for existing definitions that can be adopted.
- T6. This comment is partially accepted; the single RA will determine how to assign unique identifiers.
- T7. This information is already given in another register entry field – see clause 13.
- T8. This comment is overtaken by the change to a single JTC 1 RA.
- T9. This comment is accepted. The next WD will state that free WWW access to the full PP/package technical specification shall be provided.
- T10. This comment is accepted. The duplicate paragraph in Section 13 will be deleted.
- T11. This comment is overtaken by the change to a single JTC 1 RA.
- T12. Part (a) is overtaken by the change to a single JTC 1 RA. Part (b) – the requirement for uniqueness will be removed in the next WD.

- T13. This comment is partially accepted. A requirement will be added to the next WD to ensure that the register is kept available and accurate, but under the RA duties section.
- T14. This comment is not accepted. The current title is believed to be clearer.
- T15. This comment is overtaken by the change to a single JTC 1 RA.
- T16. This comment is not accepted.
- T17. This comment is not accepted. The relevant information is not defined in ISO/IEC 15408.
- T18. This comment is accepted and a consistency check will be made by the Editor.
- T19. This comment is not accepted. Entries can be for both PPs and packages.
- T20. This comment will be resolved by expanding TOE in place.